

64240-2

10/10/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OCT 10 2008

Ms. Ana Rodriguez-Koster  
Agent for Combat Insect Control Systems  
Lewis & Harrison, LLC  
122 C Street, N.W. Suite # 740  
Washington, DC 20001

RE: Notification to delete two Alternate Brand Names  
EPA Registration Number: 64240-2  
Date of Submission: August 26, 2008

Dear Ms. Rodriguez-Koster:

This letter is to acknowledge your request to the Agency in a letter dated August 26, 2008 to delete two alternate brand names: "**Combat Colony Kill Roach Baits**" and "**Combat Nest Kill Roach Baits**." Our records have been updated to reflect this change.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

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Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

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 <b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> <b>Other - Notification</b>	OPP Identifier Number <b>265394</b>
	<b>Application for Pesticide - Section I</b>		

1. Company/Product Number <b>64240-2</b>	2. EPA Product Manager <b>Richard Gebken</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Combat Roach Killing System</b>	PM# <b>10</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> c/o Henkel Consumer Goods Inc. <b>15101 N. Scottsdale Road</b> <b>Scottsdale, AZ 85254-2199</b> NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: <div style="text-align: center; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ <b>OCT 10 2008</b> _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> <b>Notification - Explain below.</b>	<input type="checkbox"/> Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**NOTIFICATION PER PR NOTICE 98-10 TO DELETE TWO ALTERNATE BRAND NAMES**

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

Signature: Ana Rodriguez-Koster Date: 8/26/08

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt.    No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____		
			<input type="checkbox"/> Paper glued		
			<input type="checkbox"/> Stenciled		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name <b>Ana Rodriguez-Koster - Lewis &amp; Harrison, LLC,</b> 122 C St. NW #740, Washington DC 20001	Title <b>Agent for Combat Insect Control Systems</b>	Telephone No. (Include Area Code) <b>202.393.3003 ext. 17</b>
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature <u>Ana Rodriguez-Koster</u>	3. Title <b>Agent for Combat Insect Control System</b>	
4. Typed Name <b>Ana Rodriguez-Koster</b>	5. Date <b>8/26/2008</b>	



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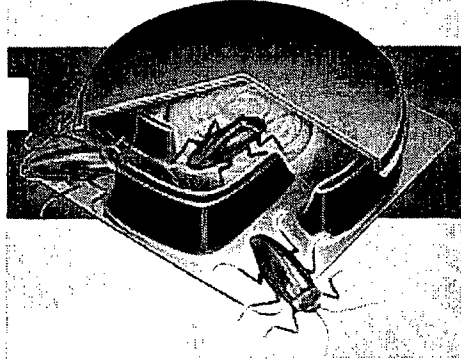
Note: *Bold, Italicized text is information for the reader and is not part of the label.*  
[Bracketed information is optional text.]  
Underlined text is new.

Master Label, August 2008  
EPA Reg. No. 64240-2  
Combat Roach Killing System  
Pg 1 of 7

# COMBAT<sup>®</sup> Roach Killing System

[ Alternate Brand Name = Combat<sup>®</sup> Source Kill<sub>1</sub> ]

[ Alternate Brand Name = Combat<sup>®</sup> Source Kill<sub>2</sub> ]



**NOTIFICATION**

**OCT 10 2008**

*OPTIONAL Example of an illustration depicting a cut-away view of a bait station and roaches.*

[Kills][For] Small Roaches

-or-

[Kills][For] Large Roaches[, Waterbugs & Palmetto Bugs]

## [ROACH]

ACTIVE INGREDIENT: Hydramethylnon† ..... 2.0%

OTHER INGREDIENTS: ..... 98.0%

†CAS No. 67485-29-4.

**DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATION.**

## **CAUTION**

[See end -or- side -or- bottom -or- back panel for additional precautionary statements.]

[See precautionary statements on side -or- back panel.]

EPA Reg. No. 64240-2

EPA Est. No. 071106-GA-001

Distributed by & ©2007 Combat Insect Control Systems

[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

MADE IN U.S.A.

[For Small Roaches] -or- [For Large Roaches]

Contains] [6] [8] [12] [18] [2.25" x 2.25"]

CHILD-RESISTANT BAIT STATIONS

[TOTAL] NET WT. [0.21oz (6g)] [0.28oz (8g)] [0.370 oz. (10.5g)] [0.42 oz. (12g)]

[0.494 oz. (14g)] [0.63 oz. (18g)] [0.741oz. (21g)] [1.013 oz. (31.5g)]

[U.S. Patent Nos. \_\_\_\_\_ and other patents pending.]

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**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

**FIRST AID:** If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. Combat [Information] Helpline: 1-800-426-6228.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in cool, dry area out of reach of children.

**DISPOSAL:** **If empty:** Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

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Combat Roach Killing System  
Pg 3 of 7

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

### GENERAL INFORMATION

[THIS IS] [HOW] COMBAT® [ROACH KILLING SYSTEM] [*Alternate Brand Name*] WORKS:

- [1.] Roaches enter [the] bait station and eat the bait.
- [2.] [Roaches take the bait back to the nest.] *-or-* [Roaches return to their nest and die.]
- [3.] [Roaches share the bait, killing other roaches and destroying the nest.] *-or-* [Other roaches eat them and die, creating a chain reaction.]



*OPTIONAL Example of illustrations to depict how this product works.*

[This product is specifically designed for roaches - *or* - [large roaches, waterbugs & palmetto bugs.] [Select the right COMBAT® Roach Killing System for your roach problem by using the pictures below to identify which type of pest you have.]\*

[Large, 1" to 1 1/2" Cockroach. Habits: Primarily live and breed outdoors and enter homes in search of food. Bait station placement near potential points of entry is key.]\*

*Place holder for optional picture of a large roach.*

[Small, 1/2" Cockroach. Habits: Primarily live and breed in moist areas like kitchens and bathrooms. [More bait stations are required for effective control.]]\*

*Place holder for optional picture of a small roach.*

[If you have seen both types of cockroach in your home, it is strongly suggested that you purchase both sizes of COMBAT® Roach Killing System for effective roach control.]\*

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## DIRECTIONS FOR USE, continued

### GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove or puncture label on bait stations.

### APPLICATION INSTRUCTIONS

1. [For best results] Use all 6 *-or-* 8 *-or-* 12 *-or-* 18 bait[s] [stations] [at the same time for thorough control.] [Remove wrapper.] [Open pouch and separate the bait stations from plastic frame.] [Now the baits are ready to use.] Break [COMBAT®] bait[s] [stations] apart. Do not remove or puncture [the] label[s] on bait station[s]. Place bait[s] [stations] wherever you see [or have seen] roaches *-or-* signs of roaches [at least 6 *-or-* 10 bait stations in the kitchen and 2 in each bathroom] as shown in diagrams to the right [left] [above] [below] [Refer to diagram[s] for [other] placement locations.]

[Severe roach problems may require [2 boxes or more.]]

[Place bait stations wherever roaches are seen *-or-* near doors and windows.]

[Specific placement areas include under] appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers. [(under refrigerator and appliances, inside cabinets and drawers)]

2. Place [baits] properly so [that] they are touching walls and corners.  
[Do not use sprays or foggers [around] [on or near] baits [: they can contaminate bait stations and reduce effectiveness.]

[(Food storage and water sources are the most common roach areas.)]

[Then place additional baits about 1 ½ feet away.]

[The more bait stations place out, the more roaches find the bait.]

[This means faster and more effective control of your roach problem.]

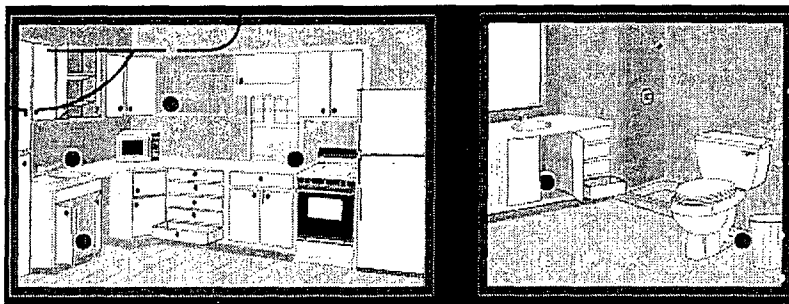
[Bait[s]-[stations]-work-best-[on-horizontal-surfaces]-[when]-touching-corners-and-walls.]

[Use enclosed stickers for vertical surfaces.]

[Use *-or-* Only use enclosed stickers when placing them upside down [or on walls].]

[Use enclosed stickers as needed.] [It is not necessary to use stickers on all baits.]

3. Replace all 6 *-or-* 8 *-or-* 12 *-or-* 18 bait[s] [stations] [at least] every 3 months, or sooner if infestation is heavy *- or -* [roaches] [they] return [, because roaches *- or -* they have probably eaten all of the bait [inside]. [Use enclosed replacement reminder.]



*OPTIONAL Example illustration of suggested bait station placement sites.*

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## DIRECTIONS FOR USE, APPLICATION INSTRUCTIONS, continued

### ***Optional Directions for 6-Count Only:***

1. [ [Remove wrapper.] Break COMBAT<sup>®</sup> bait stations apart. Use all 6 bait stations at the same time.
2. Place bait[s] [stations] wherever you see or have seen roaches ***-or-*** roaches are seen. Do not use sprays or foggers around ***-or-*** on ***-or-*** near baits; they can contaminate bait stations and reduce effectiveness.
3. Bait[s] [stations] work best [on horizontal surfaces] [when] touching corners and walls. [Place baits properly so that they are touching walls and corners.] [as shown in diagrams to the right ***-or-*** left .] [Use enclosed stickers for vertical surfaces.] [Only] [Use enclosed stickers when placing them on walls [as needed]. It is not necessary to use stickers on all baits.]
4. Place stations where you have seen roaches or have seen evidences of roaches. Most common areas are the kitchen and bathroom. (Food storage and/or preparation areas and water sources are the most common roach areas.)
5. Be sure to use all 6 bait stations. Severe roach problems may require you to use more than 1 box.
6. Replace all 6 bait stations [at least] every three months or sooner if roaches return, because they have probably eaten all of the bait [inside]. [Use enclosed replacement reminder.]

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Pg 6 of 7

***Claims for Front or Back:***

[Laboratory and home use test prove COMBAT® provides 3 months of effective control (for small roaches).]\*

[Easy to use]

[Nothing to activate]

[No vapor, fumes or odor]

[Bonus Pack] (*applies to packs to which more baits are added, not to exceed 18 total*)

[50% More Free] (*applies to packs to which 50% more baits are added, not to exceed 18 total*)

[6 Bonus Baits With Purchase] (*applies to packs to which 6 more baits are added, not to exceed 18*)

***For Small Roaches:***

- [This product is specifically designed for small roaches.]
- Kills eggs and roaches [or roaches and eggs] at their source
- Prevents roach reproduction
- Prevents egg hatching
- [The Domino Effect™]
- As The Domino Effect™ spreads through the roach population, most roaches are killed, and still others lose their ability to produce eggs
- This product's patented action formula kills roaches and eggs
- [This product provides complete roach control]\*
- This product disrupts the reproductive cycle of roaches
- Kills roaches and eggs while you sleep
- [Kills roaches & eggs for 3 months]\*
- Kills roaches at their source
- [Three months effective control]\*

***For Large Roaches:\****

- [Kills roaches at their source]\*
- [Large bait kills large roaches]\*
- [Solves large roach problems]\*

[\*Not for 6 count]

[Should you have any questions regarding COMBAT®, please call 1-800-426-6228, - or -  
[For questions or comments, please call] [C]all the COMBAT® Information Helpline at 1-800-426-6228 for more information.]] Questions or Comments? Call 1-800-426-6228

Guaranteed to work [or your money back]! [EFFECTIVENESS GUARANTEED: COMBAT® stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding COMBAT®, please call 1-800-426-6228.]



[[The paperboard in this] [C]arton [contains] [is made from] \_\_\_\_\_% Recycled fiber  
[minimum \_\_\_\_\_% post consumer content]] [Please Recycle Empty Carton.]

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Master Label, August 2008  
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Pg 7 of 7

UNIT LABEL

[actual size of each unit label is approx. 2.25" x 2.25"]

**COMBAT<sup>®</sup> Roach Killing System**

[ Alternate Brand Name = Combat<sup>®</sup> Source Kill<sub>1</sub> ]

[ Alternate Brand Name = Combat<sup>®</sup> Source Kill<sub>2</sub> ]

[THIS SIDE DOWN [OR] AGAINST [THE] SURFACE.]

[THIS SIDE DOWN: This side should be placed against the surface.]

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylnon† ..... 2.0%

OTHER INGREDIENTS: ..... 98.0%

†CAS No. 67485-29-4

**DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATION.**

**CAUTION**

**DISPOSAL:** If empty: Do not reuse this container. Place in trash. If partially filled: Call you local solid waste agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Should you have any questions regarding COMBAT<sup>®</sup>, please call 1-800-426-6228] [For questions or comments, please c] [C]all the COMBAT<sup>®</sup> Information Helpline at 1-800-426-6228 for more information.]] [Questions or Comments? Call 1-800-426-6228]

Distributed by & ©2007 Combat Insect Control Systems  
[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254  
MADE IN USA

EPA Reg. No. 64240-2  
EPA Est. No. 071106-GA-001

[FOR SMALL ROACHES]  
[FOR LARGE ROACHES]

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS -or-  
ADDITIONAL PRECAUTIONARY STATEMENTS

NET WT. [0.035oz (1g)] [0.062oz (1.75g)]